UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

ERIN JO CHASKEY,	))Case No.: 1:22-cv-11380-TLL-PTM)
Plaintiff,	) HON. THOMAS L. LUDINGTON
v	)
	) MAGISTRATE JUDGE
ONAWAY AREA COMMUNITY	) PATRICIA T. MORRIS
SCHOOLS; MARTY MIX; ROD	)
FULLERTON; MICHAEL BENSON;	)
MICHAEL HART; MINDY HORN;	)
PRESQUE ISLE COUNTY, JOSEPH	)
BREWBAKER; DAVID SCHMOLDT;	)
and KENNETH RADZIBON,	)
	)
Defendants.	)
	)

ORDER GRANTING STIPULATED DISCOVERY PROTECTIVE ORDER

This matter, having come before the Court upon stipulation and agreement by and between the

parties, through their respective counsel:

RECITALS:

1.   On October 31, 2022 and December 14, 2022, Defendants forwarded Plaintiff certain

discovery requests related to production of authorizations, including medical records.

2.   That all parties find it advisable to voluntarily enter into a Protective Order prior to the

release of the information requested in the Defendants' discovery requests.

IT IS THEREFORE ORDERED:

1.   Plaintiff shall produce to Defendants all requested authorizations within seven (7) days of

this Order. The records received shall be deemed "Confidential Documents."

2.   Confidential Documents and information derived from these documents shall be used

solely and exclusively for purposes of this lawsuit and may not be disclosed except as set forth below.

3.   Confidential documents and information contained therein shall not be disclosed to any person other than the parties (including client representatives), counsel of record for the respective parties to this litigation, their paralegal and clerical staff of same, expert witnesses or consultants engaged by counsel, and the Court or Court Personnel. Any actual review of confidential documents by the parties, including client representatives, will physically take place at the respective counsel office for the parties / client representatives.

4.   All persons to whom Confidential Documents are disclosed are hereby enjoined from using the same except in connection with this litigation with such safeguards set forth herein, and from disclosing the same with any other person except as provided herein. A breach of the provisions of this Order may be subject to appropriate sanctions, at the discretion of the Court as authorized by any statute, rule or the inherent power of the Court, or as otherwise provided by law.

5.   The production of documents and information subject to this Protective Order does not constitute an admission or agreement that any document or information is admissible as evidence in this case.

6.   If the Confidential Documents are released to an outside consultant or expert witness, the party and/or said party's counsel releasing the document(s) shall, prior to releasing said documents, ensure that the person to whom disclosure is made has:

       a.   read this Order in its entirety; and

       b.   signed a copy of this Order, signifying agreement to its provisions and consent to the jurisdiction of this Court over his or her person for any proceedings involving alleged improper disclosures.

7.   This Protective Order and the provisions herein are without prejudice to reconsideration by the Court as discovery continues in the nature of said documents referred to herein.

8.   The provisions of this Order shall survive and remain in full force and effect after the

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entry of final judgment (including any appellate proceedings) in this case, whether by settlement or litigation unless otherwise ordered by this Court.

IT IS SO ORDERED.

Dated: February 17, 2023   s/Thomas L. Ludington
                                            THOMAS L. LUDINGTON
                                            United States District Judge

I hereby stipulate to entry of the above order which is approved as to form:

Dated: February 17, 2023

/s/ Daniel Harris
DANIEL HARRIS (P58279)
Attorney for Plaintiff

Dated: February 17, 2023

/s/ Holly Battersby
HOLLY BATTERSBY (P72023)
Attorney for Presque Isle Co,
Brewbaker, Schmoldt & Radzibon

Dated: February 17, 2023

/s/ Gregory W. Mair
GREGORY W. MAIR (P67465)
Attorneys for Defendants Onaway Schools,
Mix, Fullerton, Benson, Hart & Horn